

Engineering Statement

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For FM stations, the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns were used. The requisite 3.16 mV/m (70 dBμ) and 1.0 mV/m (60 dBμ) contours were determined using NGDC 30-second terrain data along each of the 8 standard 45-degree spaced radials from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. For stations employing directional antennas, the radials were spaced every 10 degrees, in addition to the standard 45-degree spaced radials.

The distances to contours were then fed into a computer algorithm² which interpolates distances to contours for one degree of azimuth (ie: 360 distanced per contour file). This data from this algorithm was used, in turn, to drive a digital plotter to produce the contours shown on the maps attached herewith.

Conclusion

From a search of the FCC AM and FM databases, it was determined that a total of 24 aural facilities provide service to the general area, 9 AMs and 15 FM.

² The specific method used is based on Algorithm 433 of the Association for Computing Machinery; see **Communications of the ACM**: Volume 15, Number 10; October 1972.

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When considering the FM “City Grade” or 70 dB μ contours (Figure 1), and the AM 5.0 mV/m contours (Figure 3); 18 stations cover all of both of Ankeny and the Des Moines Urbanized Area. Another 3 stations cover some percentage of both Ankeny and the Des Moines Urbanized Area, and three stations cover some part of the Des Moines Urbanized Area, but none of Ankeny.

Further, when considering the FM “Interference Free” or 60 dB μ contours (Figure 2), and the AM 5.0 mV/m contours (Figure 3); 21 stations cover all of both Ankeny and the Urbanized Area, 1 covers some percentage of both, and two fail to cover any portion of Ankeny.

It should be noted that the only FM station which fails to provide service to Ankeny under either scenario is KWDM, which operates on a limited time basis as a minimal class A facility with 100 Watts from 52 meters HAAT.

Proximity

An additional study to determine the proximity of Ankeny to the Des Moines Urbanized Area was performed. Figure 3 presents the Des Moines Urbanized Area as defined in the Bureau of Census, “1980 Census of Population” data for Iowa. Also indicated on this map is the southern most boundary of the “incorporated place”³ of Ankeny. It is believed that the nearest point of the boundary of Ankeny is

³ As defined by the Bureau of the Census.

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approximately 0.5 miles distant from the Des Moines Urbanized Area. It is also noted that the Standard Metropolitan Statistical Area defined as "Des Moines" includes Polk and Warren counties of Iowa, and further that both Ankeny and Des Moines city are included in Polk county.

Certification

CURTIS L. PERRYMAN, being a principle engineer of the firm of Suffa and Cavell, Inc., consulting engineers; states:

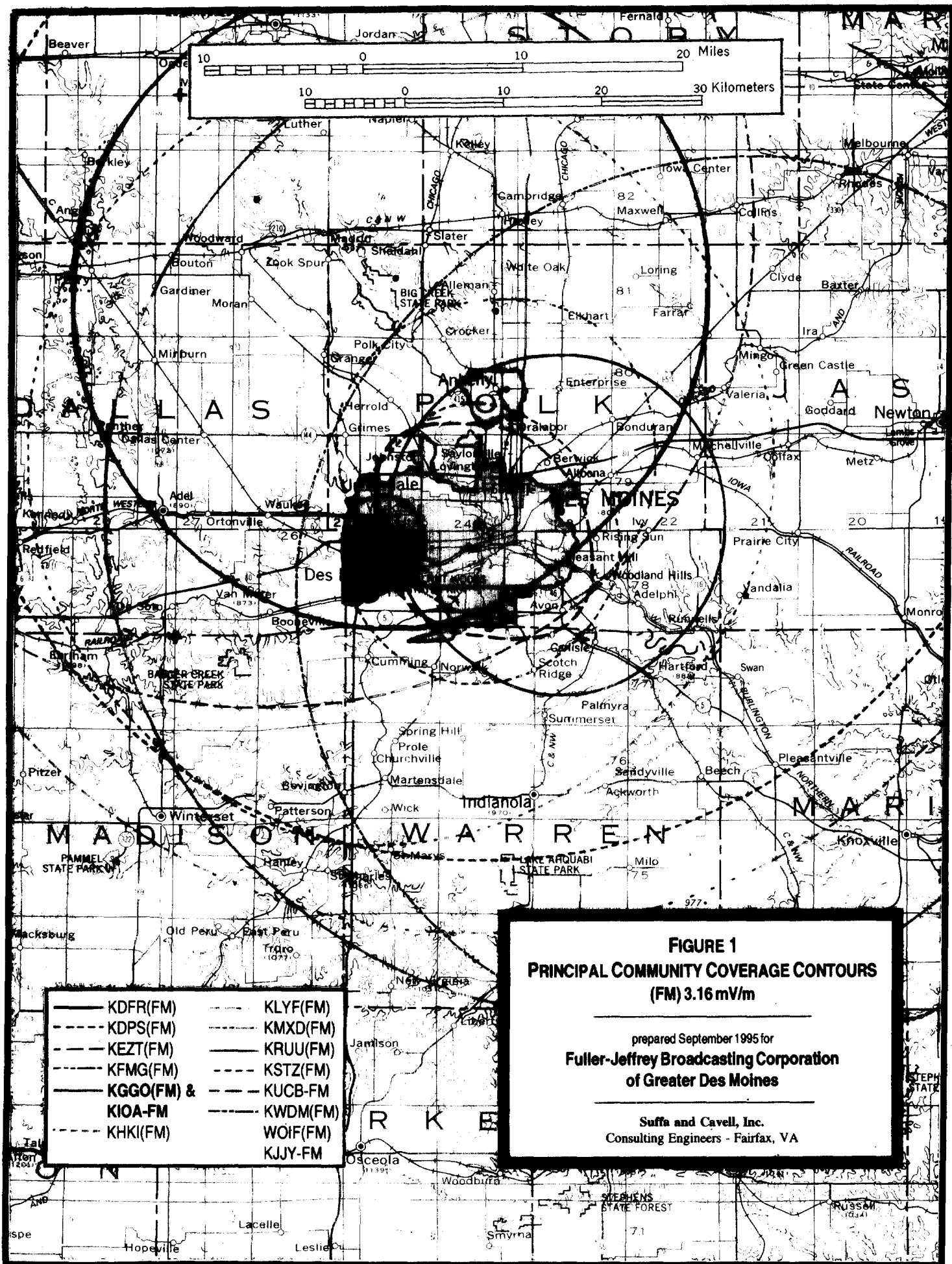
That his qualifications are a matter of record with the Federal Communications Commission;

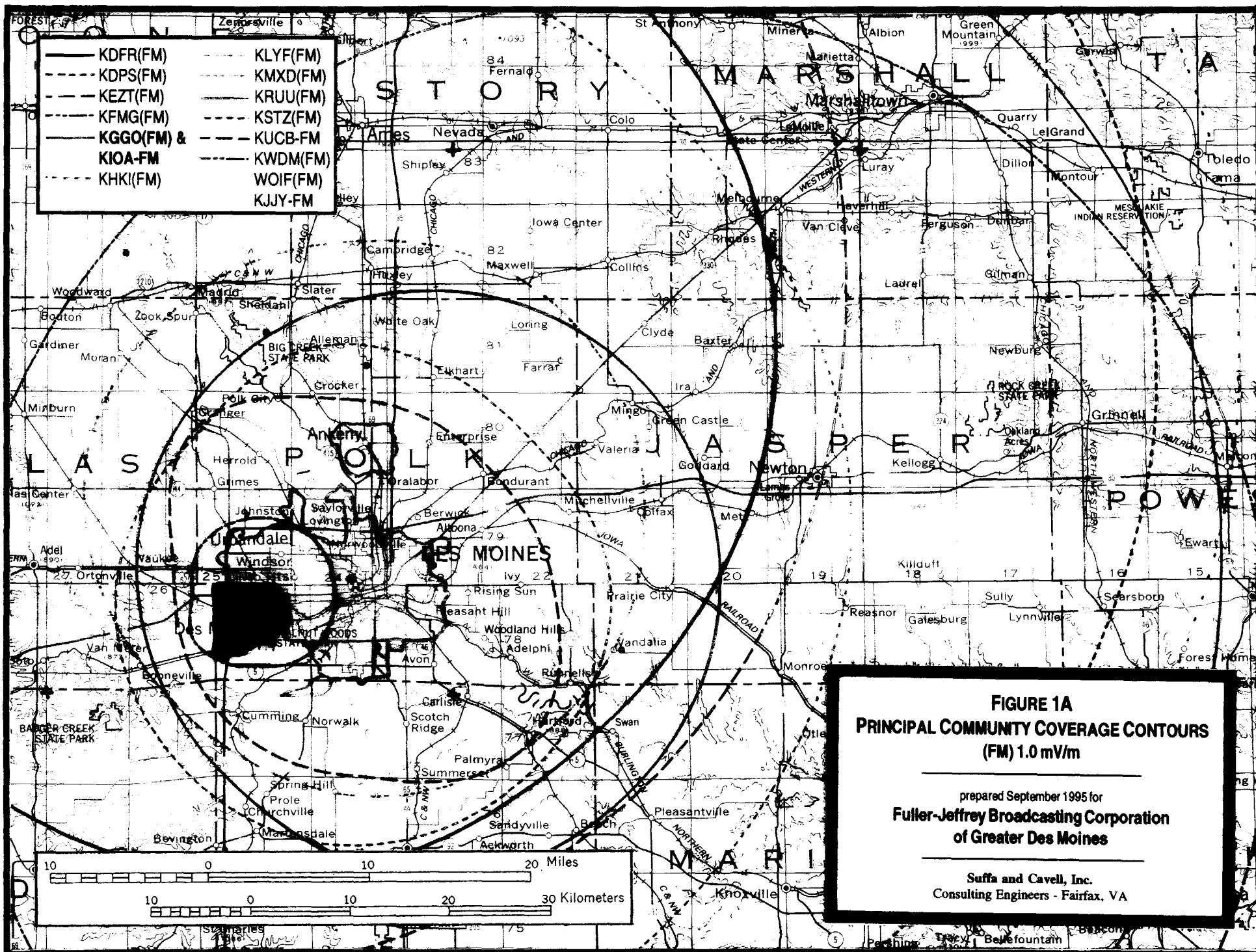
That this firm has been retained by Fuller-Jeffery Broadcasting Corporation to prepare this engineering statement;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

A handwritten signature in cursive script, reading "Curtis L. Perryman", followed by a horizontal line.

Curtis L. Perryman





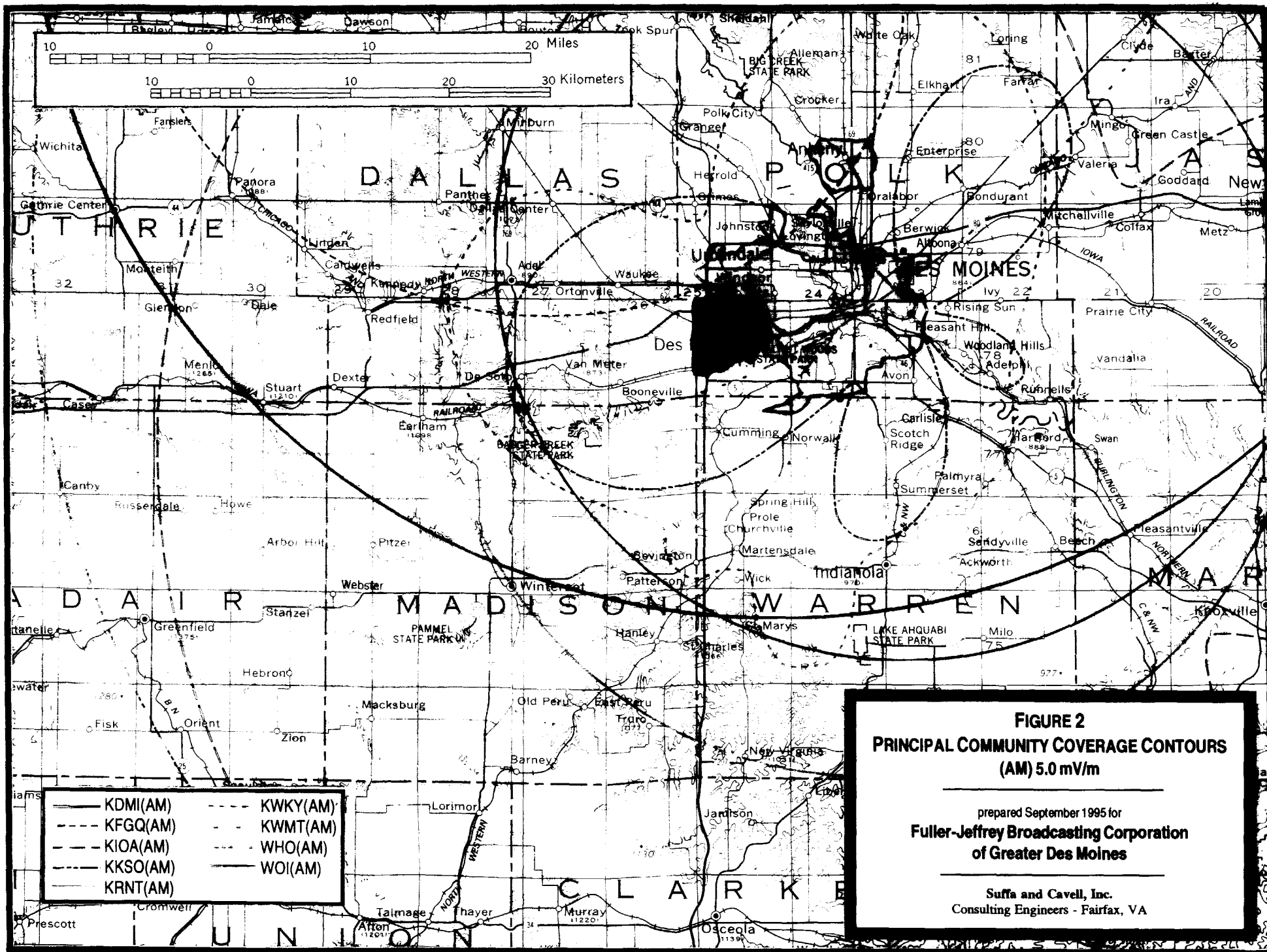


FIGURE 2
PRINCIPAL COMMUNITY COVERAGE CONTOURS
(AM) 5.0 mV/m

prepared September 1995 for
Fuller-Jeffrey Broadcasting Corporation
 of Greater Des Moines

Suffa and Cavell, Inc.
 Consulting Engineers - Fairfax, VA

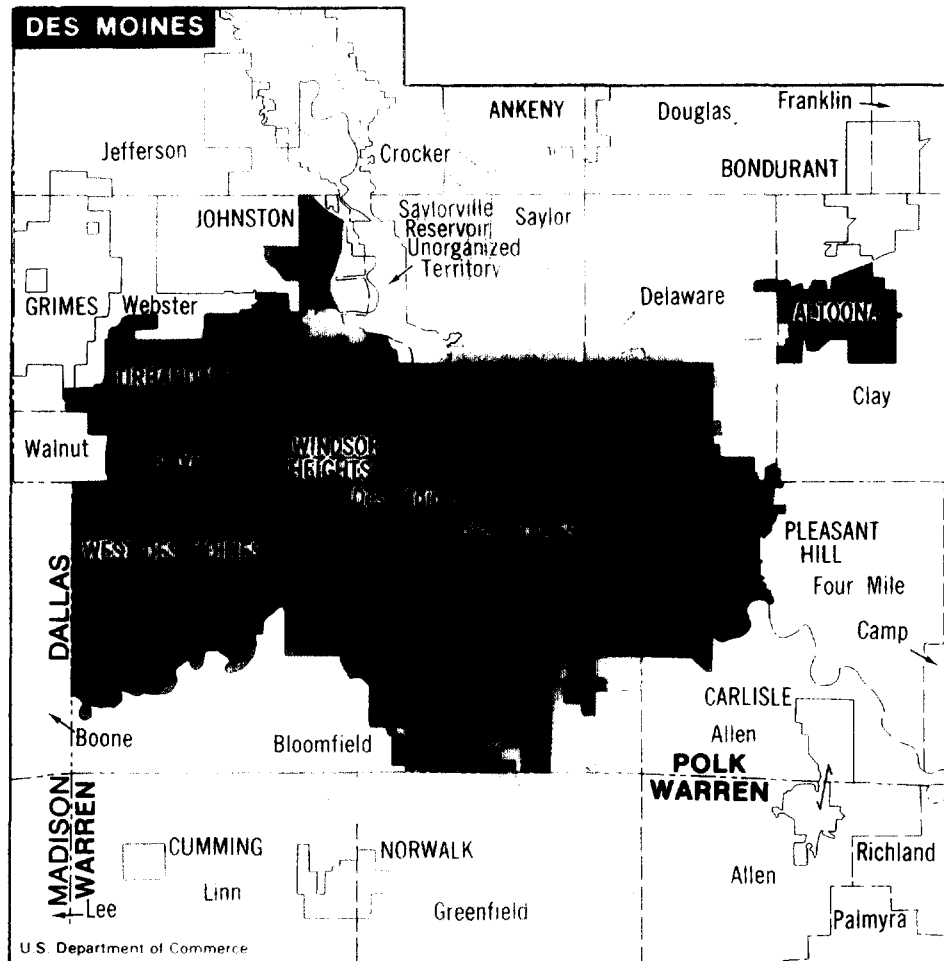
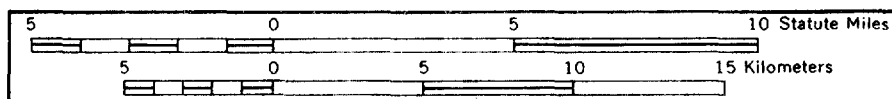


FIGURE 3 COMMUNITY BOUNDARIES

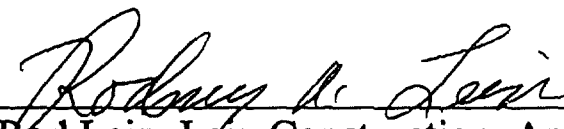
prepared September 1995 for
**Fuller-Jeffrey Broadcasting Corporation
of Greater Des Moines**

Suffa and Cavell, Inc.
Consulting Engineers - Fairfax, VA



APPENDIX 2

“The communities in the Greater Des Moines area all work together. That’s the reason we are experiencing the growth we are seeing here. We refer to Des Moines and Ankeny as the ‘Golden Circle Area.’”



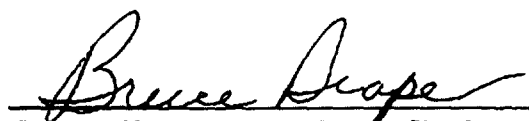
Rod Lein, Lein Construction, Ankeny.
September 1, 1995

“Employment and business goes both ways between Ankeny and Des Moines. We’re just part of Des Moines. The only thing that separates us is real estate.”

A handwritten signature in cursive script, reading "A. Dean Lange". The signature is written in black ink and is positioned above a horizontal line.

**Dean Lange, Lange Tire and Automotive Center, Ankeny.
September 1, 1995**

"Ankeny is definitely a suburb of Des Moines."

A handwritten signature in cursive script that reads "Bruce Draper". The signature is written in dark ink and is positioned above a horizontal line.

Bruce Draper, Ankeny Dairy Queen.

September 1, 1995

APPENDIX 3

DECLARATION

I, Robert L. Caron, do hereby declare under penalty of perjury pursuant to the laws of the United States of America that I am a Senior Vice President and an Assistant Secretary of Fuller-Jeffrey Broadcasting Corporation of Greater Des Moines, that I am the General Manager of FM radio broadcast station KJJY, that I have personally researched much of the demographic, economic, political, and commercial data set forth in the foregoing Comments, that I have read the foregoing Comments, and that to the best of my knowledge and belief all matters of fact asserted in the foregoing Comments (other than matters of which the Commission may take official notice) are true and correct.

Executed in Des Moines, Iowa this fifth day of September, 1995.

A handwritten signature in black ink, appearing to read 'R. Caron', is written over a horizontal line.

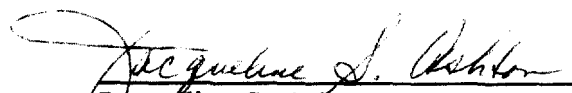
Robert L. Caron

CERTIFICATE OF SERVICE

I, Jacqueline S. Ashton, a secretary in the law firm of Bryan Cave LLP, do hereby certify that I have on this fifth day of September, 1995, caused copies of the foregoing **COMMENTS** to be mailed to the following by first-class United States mail, postage prepaid:

John A. Karousos, Esq.
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Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
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Jacqueline S. Ashton